

**EXHIBIT A**

**Proposed Order**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
JOANN INC., et al.,	Case No. 25-10068 (CTG)
Debtors. <sup>1</sup>	(Jointly Administered)
	Re: DI 1016

**ORDER (I) AUTHORIZING (A) REDACTION OF CERTAIN CONFIDENTIAL  
INFORMATION FROM EXHIBITS A AND B TO OBJECTION TO DEBTORS'  
AMENDED FIRST NOTICE OF ASSUMPTION AND ASSIGNMENT OF CERTAIN  
EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES**

Upon the motion (the “Motion”)<sup>2</sup> of Myrtle Beach Farms Company, Inc. (“Landlord”) for entry of an order (this “Order”) authorizing Landlord to file under seal the Confidential Information set forth in the Motion and file the unredacted under seal; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and due and sufficient notice of the Motion having been given under the particular circumstances; and it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Motion is in the best interests of the Landlord, the

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

Debtors, their bankruptcy estates, creditors, and other parties-in-interest; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby

**ORDERED, ADJUDGED, AND DECREED that:**

1. The Motion is granted as set forth herein.
2. Landlord is authorized to file the Confidential Information set forth in Exhibits A and B under seal pursuant to section 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1(b).
3. To the extent not already filed, Landlord is directed to file an unredacted version of Exhibits A and B to the Response under seal; *provided, however*, that Landlord shall provide unredacted versions of Exhibits A and B to: (i)(a) the U.S. Trustee, (b) counsel to the Debtor, (c) the Court and (d) any party-in-interest that obtains, after notice and a hearing, authorization from this Court.
4. Landlord is authorized to take all actions necessary to implement the relief granted in this Order.
5. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.